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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 20, 1994

DOCKET FILE COPY ORIGINAL

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

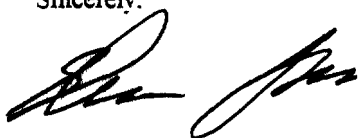
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*Here are a few of my biggest concerns about Billed Party Preference:*

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,



Benton County Sheriff's Dept.

GLENN SPENCER, SHERIFF  
P.O. BOX 67 • WARSAW, MO 65355

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July 22, 1994

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Federal Communications Commission  
1919 M Street, NW  
Washington, D. C. 20554*

*Re: CC Docket No. 92-77 Opposition to Billed Party Preference*

*Dear Chairman Hundt:*

*We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.*

*We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmates calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.*

*We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.*

*Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.*

*In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt*

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regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

Mark G. Zyluk LIEUTENANT  
Name / Title

BALTIMORE COUNTY DETENTION CENTER  
Name of Correctional Facility  
404 KENILWORTH DRIVE  
TOWSON MD. 21204  
Address

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DOCKET # 92-77 (BPP)

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Respectfully submitted,

Steven C. McLain  
Deputy Administrator

Steven C. McLain - Deputy Administrator  
Name / Title

Baltimore County  
Bureau of Corrections  
404 Kenilworth Drive  
Towson, Maryland 21204

(410) 337-6700, Fax: (410) 825-8002



BALTIMORE COUNTY DETENTION CENTER  
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404 KENILWORTH DRIVE  
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St. R. O. Bluer

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BAETO. CO. BUREAU OF CORRECTIONS

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*Shuffey Danta*  
*Shuffey Vernon Co.*

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*Robert A. McKee Sheriff*

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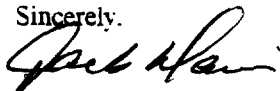
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*Reed Hundt*

*Shirley E. Messeri*

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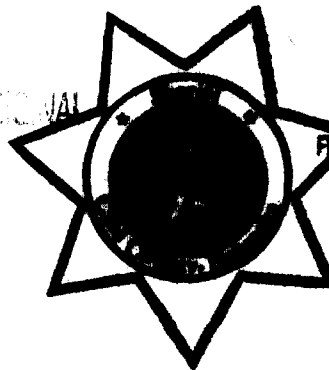
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Sincerely,

**WM. C. BRUGGEMANN**  
Cass County Sheriff  
P.O. Box 10  
Plattsmouth, NE 68048-0010

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Michael Waugh

Chief Deputy

Marinette Co Sheriff Dept  
1925 Ella Court  
Marinette, WI 54143

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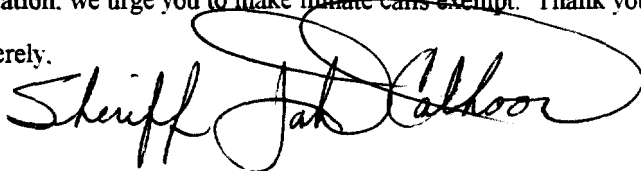
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- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,



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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

***Here are a few of my biggest concerns about Billed Party Preference:***

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Sincerely,

*Joseph P Arnold*

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1919 M Street, N.W.  
Washington, D. C. 20554

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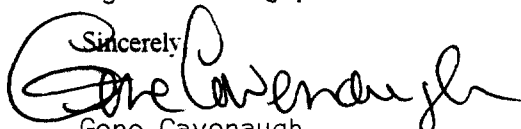
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Sincerely,



Gene Cavanaugh  
Shelby County Sheriff

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 21, 1994

The Honorable Reed E. Hunt  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

cc Doc. 92-77

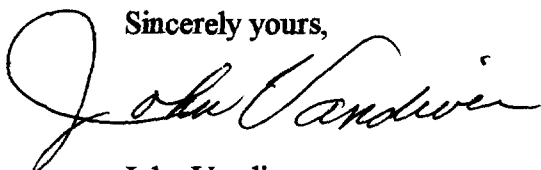
Dear Chairman Hunt:

As the Sheriff of Texas County, Missouri, I am writing to you regarding the FCC proposal for Billed Party Preference. We are currently using an Inmate Phone Service which has been very helpful in managing our inmate facility, and we would not want to lose the benefits we receive from its services.

This service was most advantageous during a recent prisoner escape. Through the records maintained by AmeriTel, we were able to determine a potential destination, possible companions, and other related information. This helped result in the prisoner's capture within a brief time. I believe that the Billed Party Preference proposal will eliminate this and other valuable benefits we now obtain from our ability to select our phone provider..

I feel that this added information available for law enforcement contributes greatly to the safety of the general public. The current practice of billing the originating telephone for a call should not be changed in the case of calls from inmate facilities. Please give this proposal a vote to exempt inmate facilities from Billed Party Preference regulations.

Sincerely yours,



John Vandiver  
Sheriff

zzb

cc: Senator John Danforth  
Senator Christopher Bond

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Washington, DC 20554

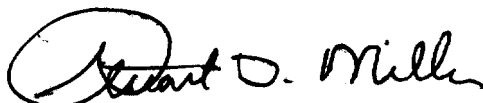
Dear Chairman Hunt:

As the Sheriff of Audrain County, Missouri, I am writing to you regarding the FCC proposal for Billed Party Preference. We are currently using an Inmate Phone Service which has been very helpful in managing our inmate facility, and we would not want to lose the benefits we receive from its services.

This service was most advantageous during a recent prisoner escape. Through the records maintained by AmeriTel, we were able to determine a potential destination, possible companions, and other related information. This helped result in the prisoner's capture within a brief time. I believe that the Billed Party Preference proposal will eliminate this and other valuable benefits we now obtain from our ability to select our phone provider..

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Sincerely yours,



Stuart Miller  
Sheriff

zzb

cc: Senator John Danforth  
Senator Christopher Bond

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AUG 12 1994

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

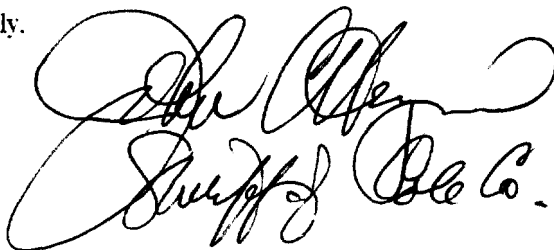
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Sincerely,



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CC Doc. 92-77

July 21, 1994

The Honorable Reed E. Hunt  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Chairman Hunt:

As the Sheriff of Newton County, Missouri, I am writing to you regarding the FCC proposal for Billed Party Preference. We are currently using an Inmate Phone Service which has been very helpful in managing our inmate facility, and we would not want to lose the benefits we receive from its services.

This service was most advantageous during a recent prisoner escape. Through the records maintained by AmeriTel, we were able to determine a potential destination, possible companions, and other related information. This helped result in the prisoner's capture within a brief time. I believe that the Billed Party Preference proposal will eliminate this and other valuable benefits we now obtain from our ability to select our phone provider..

I feel that this added information available for law enforcement contributes greatly to the safety of the general public. The current practice of billing the originating telephone for a call should not be changed in the case of calls from inmate facilities. Please give this proposal a vote to exempt inmate facilities from Billed Party Preference regulations.

Sincerely yours,



Ronald Doerge  
Sheriff

zzb

cc: Senator John Danforth  
Senator Christopher Bond

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cc Doc. 92-77

July 21, 1994

The Honorable Reed E. Hunt  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

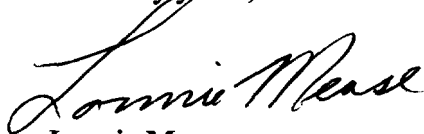
Dear Chairman Hunt:

As the Sheriff of Stone County, Missouri, I am writing to you regarding the FCC proposal for Billed Party Preference. We are currently using an Inmate Phone Service which has been very helpful in managing our inmate facility, and we would not want to lose the benefits we receive from its services.

This service was most advantageous during a recent prisoner escape. Through the records maintained by AmeriTel, we were able to determine a potential destination, possible companions, and other related information. This helped result in the prisoner's capture within a brief time. I believe that the Billed Party Preference proposal will eliminate this and other valuable benefits we now obtain from our ability to select our phone provider..

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Sincerely yours,



Lonnie Mease  
Sheriff

zzb

cc: Senator John Danforth  
Senator Christopher Bond

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August 1, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

James M. Balm MAJ  
Name/Title

DANVILLE CITY JAIL  
Name of Correctional Facility

212 LYNN STREET DANVILLE VA  
Address  
212 24543

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

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Sincerely,

  
GARY R. YOUNG  
Thayer County Sheriff  
324 Olive Avenue  
Hebron, NE 68370

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 21, 1994

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Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

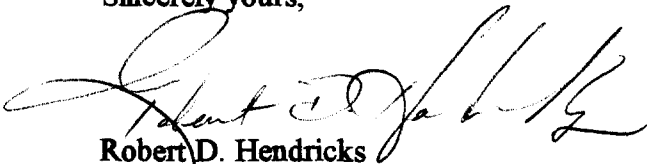
Dear Chairman Hunt:

As the Sheriff of Brown County, Kansas, I am writing to you regarding the FCC proposal for Billed Party Preference. We are currently using an Inmate Phone Service which has been very helpful in managing our inmate facility, and we would not want to lose the benefits we receive from its services.

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Sincerely yours,



Robert D. Hendricks  
Sheriff

zzb

cc: Senator Robert Dole  
Senator Nancy Landon Kassebaum

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